

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

**MEMORANDUM IN SUPPORT OF PLAINTIFFS'  
MOTION TO THE MAGISTRATE JUDGE FOR AN ENLARGEMENT OF TIME**

For the reasons set forth below, the plaintiffs respectfully move to enlarge their time to file a Reply in further support of their *Ex Parte* Motion to the Magistrate Judge to Issue a Letter of Request for Judicial Assistance (DE 206-208) until March 23, 2012:

1) On February 23, 2012, plaintiffs filed an *ex parte* motion to the Magistrate Judge to issue a Letter of Request for judicial assistance pursuant to the Hague Convention, requesting that the State of Israel cause the deposition of Ms. Sana'a Shehadeh, who was convicted for her role in the March 2002 bombing attack in which plaintiffs Dr. Alan Bauer and Y.B. were severely wounded, but released several months ago as part of a prisoner exchange. DE 206-208.

2) Defendants filed an Opposition to plaintiffs' motion, which frivolously objects to plaintiffs' motion solely for non-legal, political reasons, arguing that by requesting that Israel exercise its Hague Convention obligations to the U.S. in Jerusalem (Ms. Shehadeh's last known residence) this Court would be recognizing Israeli sovereignty in Jerusalem. DE 212, *passim*.

3) Plaintiffs intend to attach to their Reply exhibits and an affidavit demonstrating that factual and other claims made in defendants' Opposition are false.

4) Because preparation of those exhibits requires translation and consultation with experts, plaintiffs were unable to complete the Reply on the due date (March 15, 2012) and so sought defendants' consent for an enlargement.

5) Defendants agreed to an enlargement of one day only, i.e. until Friday, March 16.

6) Plaintiffs were unable to complete the Reply in that time, and have been informed by their translator and expert that the materials will be ready only toward the end of this week.

7) Accordingly, plaintiffs respectfully request an enlargement of eight days, i.e. until March 23, 2012, to file their Reply.

8) In light of the fact that the deposition at issue is sought by plaintiffs, not the defendants, the latter cannot possibly be prejudiced by relief sought.

**WHEREFORE**, the instant motion should be granted.

Plaintiffs, by their Attorney,

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